# **EXHIBIT B**

**Filed Under Seal** 

**Sealed Version** 

FD-302 (Rev. 5-8-10)

-1 of 11-

## FEDERAL BUREAU OF INVESTIGATION



Date of entry 05/15/2019

Davina Isackson was interviewed at the USAO. SAs Laura Smith and Elizabeth Keating, Forensic Accountant Nicholas Savona; AUSAs Eric Rosen, Justin O'Connell, and Leslie Wright; and defense counsel David K. Willingham and Michael V. Schafler from Boies, Schiller, Flexner LLP, and Peter E. Gelhaar from Donnelly, Conroy & Gelhaar, LLP were also present. After being advised of the identity of the interviewing Agents and the nature of the interview, ISACKSON provided the following information:

## **BACKGROUND:**

ISACKSON really messed up, agreed to change her children's test scores, and owned her part in her wrong doings.

ISACKSON was born in Montreal, Canada and lived there for the first 18 years of her life. While growing up, her parents divorced and her brother died. ISACKSON went to the University of Miami (UOM), and was interested in pre-med. She then received her masters in biomedical engineering. ISACKSON moved to California in or around 1991. In or around 1992, she married her husband BRUCE ISACKSON (BRUCE). ISACKSON had four children: EVAN - 23 years old, went to UOM, LAUREN - 21 years old, went to University of California Los Angeles (UCLA), AUDREY - 19 years old, went to University of Southern California (USC), and RYAN.

ISACKSON knew LIZ HENRIQUEZ (LIZ) through their daughters who rode horses together. In or around August 2015, LAUREN fell off her horse. During LAUREN's recovery, LIZ asked ISACKSON if she had a college counselor. LIZ introduced ISACKSON to RICK SINGER (SINGER). LIZ never told ISACKSON that she did anything related to the scheme with SINGER.

#### **LAUREN:**

LAUREN's high school, WOODSIDE PRIORY, had approximately 75 students

 Investigation on
 04/02/2019 at
 Boston, Massachusetts, United States (In Person)

 File#
 318A-BS-2885343
 Date drafted
 04/03/2019

by Kaitlyn Cedrone, Smith Laura, KEATING ELIZABETH ANNE, SAVONA NICHOLAS BRANDON

Continuation of FD-302 of (U) Davina Isackson

On 04/02/2019 Page 2 of 11

per grade, approximately 400 in total. LAUREN had approximately a 3.3 GPA, no AP classes, and a 27/28 ACT score. Freshman year LAUREN was not very studious, sophomore year was her transition to a new school so it was difficult, and by junior year she was super serious with her studies. LAUREN had documented learning disabilities that were real since the 9th grade. Her testing was done by the family's psychologist, LISA LAVICE (LAVICE). LAVICE tested all of ISACKSON's children. All of her children received 50% extra time in a separate testing room. LAVICE had no improprieties. BRUCE had undiagnosed ADD and dyslexia.

LAUREN went to the same school as MIKE SCHAEPE (SCHAEPE), who ISACKSON knew as CHIU SCHAEPE. ISACKSON did not really talk to SCHAEPE's parents, but they did have Warrior seats two rows behind the SCHAEPE family seats so ISACKSON saw the SCHAEPE family out in public. SCHAEPE was one year older than LAUREN. The kids became friendly through school. SCHAEPE was the stat's guy for University of Texas (UT) basketball. He was made fun of because he was known as the stat's guy, but it did not make sense because he was not that smart. The rumor was he got into UT through basketball, but was not a player. ISACKSON received her information on him from LAUREN. She did not know what SCHAEPE looked like and would not be able to pick him out.

LAUREN played soccer since she was approximately five years old; however, she was not being recruited by any collegiate team. LAUREN was more of a horseback rider.

LIZ told ISACKSON that SINGER was obnoxious. After being referred by LIZ, ISACKSON emailed SINGER. They decided to meet with LAUREN at a Four Seasons Hotel. This was LAUREN's first outing since her horseback riding accident. During the meeting SINGER and LAUREN discussed her interests, community service, schools she wanted to go to, etc. LAUREN was in September of her senior year during this meeting. There was no discussion of cost at the hotel meeting, as it was just for SINGER to get to know LAUREN. The next meeting with SINGER was at ISACKSON's house. It was a similar type of meeting where SINGER and LAUREN discussed general topics, such as classes and her recovery from the riding accident. The third meeting with SINGER was about LAUREN's list of schools she was interested in. University of Miami was on the top of her list. At some point SINGER stated he could help with certain schools as he had relationships. SINGER

Continuation of FD-302 of (U) Davina Isackson

On 04/02/2019 Page 3 of 11

began name dropping, to which ISACKSON took with a grain of salt. SINGER said the schools he could help with were Miami, Tulane, Santa Clara, Cal Poly, BU, and NYU. SINGER had all sorts of connections, and at some point USC also came up in conversation. LAUREN was not present for this part of the meeting. ISACKSON asked SINGER how it worked. SINGER said he had relationships that recruited athletes and supported the teams. ISACKSON believed the donation money was going to fund a kid to go to school. This was when she realized there was a price tag on LAUREN getting in to school. BRUCE did not attend any of the three or so meetings with ISACKSON and SINGER. ISACKSON consulted with BRUCE, and they agreed that they were interested in SINGER's services.

MIKAELA SANFORD was in charge of uploading everything for the applications, i.e. transcripts, GPA, test scores, etc. Later on, SINGER told ISACKSON he needed a picture to portray LAUREN as an athlete. SINGER needed the picture to have LAUREN touching a soccer ball. SINGER told ISACKSON not to worry and that he would take care of it. At this point ISACKSON knew something was wrong, and it was really bad to portray LAUREN as an athlete. ISACKSON gave SINGER permission to lie about her daughter's identity. ISACKSON felt stuck because SINGER used a calming mechanism for her; she did not know how to get out of the pile of lies. SINGER kept telling ISACKSON he did this all the time, and how he had relationships with all these coaches. The Foundation's website showed that they were helping underprivileged kids. ISACKSON believed she was helping fund a student's scholarship that would not otherwise be able to go to college. However, ISACKSON knew this process was not legit because she had to lie about LAUREN. ISACKSON was absolutely aware that other families participated in this college bribery scheme. SINGER told ISACKSON that the coach knew what was going on, and he diminished everything to her. ISACKSON knew that getting LAUREN into college was a monetary transaction. SINGER lied to ISACKSON constantly.

USC was a highlight for them. It was close to home, which made it appealing. ISACKSON was caught up in a frenzy after USC did not pan out. She did not have insight into what happened at USC. SINGER said that it was because LAUREN was a liability due to her concussion.

A couple of weeks later, in or around February, ISACKSON received a call from SINGER telling her they could do the same thing at University of

Continuation of FD-302 of (U) Davina Isackson

On 04/02/2019 Page 4 of 11

California Santa Barbara (UCSB) for \$200,000. SINGER felt bad about what happened with USC. SINGER said they needed to move fast, tour the school, and start the process as this was time sensitive. When ISACKSON and LAUREN went to UCSB there was no one on campus. The following instance they visited UCSB it was scheduled. LAUREN spent the night on campus, went to classes, and loved it. Approximately a week later, ISACKSON received a voicemail from SINGER that accused her of going behind his back and making a deal with the soccer coach. ISACKSON had no idea what SINGER was talking about. When ISACKSON spoke to SINGER on the phone, he realized she was not lying because she called the soccer coach a "he," and the coach was a woman. After this UCSB was not an option anymore.

After UCSB did not work, they proceeded with LAUREN's other applications. LAUREN was accepted to the UOM.

In or around late April, SINGER talked ISACKSON into UCLA. BRUCE went to UCLA so he was all for it. SINGER knew the men's soccer coach, and he would recruit LAUREN if ISACKSON funded a scholarship, similar to USC and UCSB. LAUREN could be as involved however she wanted to be. LAUREN still applied as a soccer player/athlete, but did not have to play. It was the same as the other schools (USC, UCSB). LAUREN was not excited at this point because she lost faith in SINGER. LAUREN also did not want to go to UOM anymore, as it was too far from home.

In or around May 2016, SINGER put the time pressure on ISACKSON again. SINGER gave ISACKSON JORGE SALCEDO's (SALCEDO), the men's soccer coach, contact information. ISACKSON called SALCEDO. SALCEDO met ISACKSON and LAUREN for dinner. SALCEDO knew LAUREN was not a recruited soccer player. LAUREN asked what she needed to do on the soccer team. SALCEDO said whatever she wanted; it was a real relaxed conversation. The following day, they took a tour with SALCEDO. During the tour, they met AMANDA CROMWELL (CROMWELL). CROMWELL was the head women's soccer coach. They only met for approximately five minutes, and had a general conversation to include talk of LAUREN's horseback riding. CROMWELL told LAUREN that they were excited to have her, but there was no discussion of the details on what LAUREN would be doing on the team. CROMWELL did not really ask about LAUREN's soccer season. CROMWELL never saw LAUREN play soccer. The first time CROMWELL met LAUREN was this visit on campus. SALCEDO told ISACKSON that CROMWELL can take whoever she wants and she wants LAUREN. ISACKSON had an idea that

Continuation of FD-302 of (U) Davina Isackson , On 04/02/2019 , Page 5 of 11

there would be some sort of trade. SALCEDO kept talking up the women's soccer team, and told ISACKSON not to worry. ISACKSON never questioned SALCEDO; she thought he was a nice guy. SALCEDO also encouraged LAUREN, and tried to sell her on UCLA. SALCEDO told ISACKSON that they would take care of LAUREN, bring her to family dinners, and so forth. SALCEDO made it seem to ISACKSON that he was invested in LAUREN to get and keep her at UCLA. seemed genuine and like a nice guy. ISACKSON felt lucky to have this. SINGER had handed off the deal to SALCEDO, and now the sense of urgency was coming from SALCEDO. At first SALCEDO said he needed to know by the following week, then that turned into the next day. It became more urgent to make a decision. LAUREN asked what she had to do for the soccer team, and ISACKSON said it sounded like she would help the team. It was then agreed that LAUREN would go to UCLA. ISACKSON knew LAUREN had to go in to UCLA as an athlete in exchange for money, but did not know that SALCEDO was receiving the money. ISACKSON knew this deal with LAUREN getting in to UCLA only happened because of the payment. Again, ISACKSON thought the money was spent to fund a scholarship for an underprivileged student through SINGER's Foundation, but just did not know how the money was facilitated.

In or around June, there was a lot of back and forth communications with SALCEDO and SINGER. ISACKSON finally heard in or around June 29th that UCLA gave LAUREN a conditional acceptance, where she would need to participate as an athlete for one year. Prior to the acceptance letter being received, SALCEDO notified ISACKSON that the letter would be coming. ISACKSON was concerned that this deal would also fall through, much like the other schools did. During all the back and forth time, ISACKSON gave a deposit to UOM as a back up. BRUCE also sent an email to SINGER asking if they would get their money back if the deal fell through again. To which, SINGER stated yes they would get their money back. The previous issues was what prompted BRUCE's email. BRUCE paid the \$250,000 as he took care of the financials, and ISACKSON handled the kids.

Once LAUREN was accepted to UCLA, SALCEDO said all their questions could now be directed to JOSH WALTERS (WALTERS). WALTERS was the assistant women's soccer coach. WALTERS was LAUREN's new contact for any questions she had. WALTERS told LAUREN not to worry about the summer training. It was probably in person that WALTERS told LAUREN she did not have to play on the soccer team. She asked if she had to play, and WALTERS told her she

Continuation of FD-302 of (U) Davina Isackson , On 04/02/2019 , Page 6 of 11

would never play. LAUREN wanted to be a manager for the team; she was interested in sports medicine. In any event, LAUREN went to the athletic orientation, but got really sick with strep throat. This happened to her a lot, and she ended up going to therapy to help alleviate future occurrences. While LAUREN was out trying to get better, CHRISTINE RIVERA (RIVERA) was out scouting the fields at UCLA. RIVERA was some high up athletic director at UCLA. At some point, RIVERA asked what was going on with LAUREN as she was not on the field. WALTERS told SALCEDO that LAUREN was trying to get healthy. ISACKSON never met or talked on the phone to WALTERS. ISACKSON did have text communications with WALTERS during the orientation issue. SALCEDO then coached ISACKSON on what to write to RIVERA. ISACKSON never met RIVERA. At this point, it became clear to ISACKSON that LAUREN needed to be on the team, and that was what the school expected. LAUREN being accepted was actually dependent on her being an athlete on the soccer team. SALCEDO prompted ISACKSON on what to say, but told her not to use his name anymore. WALTERS did not instruct ISACKSON to lie to RIVERA; all of that was directed by SALCEDO. WALTERS mostly had direct contact with LAUREN. There was no discussion of money going to WALTERS or CROMWELL.

Subsequently, LAUREN was blocked from UCLA's portal. During this time ISACKSON was in Greece as her mom had pancreatic cancer. While in Greece, ISACKSON called SALCEDO. ISACKSON also told BRUCE, but since she was the one with the relationship with SALCEDO, she called him. SALCEDO did work to find out why LAUREN was blocked. There were questions because of her concussion, and UCLA wanted to clear LAUREN. UCLA wanted to clear her because she needed to be a part of the team to go to school there. The grounds for LAUREN at UCLA was through NCAA and playing soccer. BRUCE, GAVIN CREW, CROMWELL, and GARY CLARK all met to discuss the concerns of LAUREN's concussion. ISACKSON was on the phone for this meeting. Prior to the meeting, ISACKSON talked to SALCEDO to figure out how to prepare BRUCE for the meeting, since she would be on the phone and not in person. The whole meeting was only about clearing LAUREN of her concussion, and how they wanted UCLA to do their own evaluation. There were no discussions of why LAUREN was recruited, and no qualification questions.

While this was all going on, it was agreed that LAUREN could stay in the dorms and not be uprooted. If the issue continued with the portal,

Continuation of FD-302 of (U) Davina Isackson

On 04/02/2019 Page 7 of 11

SINGER suggested to have LAUREN take online classes, which the credits could be moved back to UCLA once she was admitted back in. LAUREN was finally cleared by the UCLA evaluations, and re-admitted to school.

After everything was said and done, CROMWELL asked LAUREN to come back and help the soccer team as a manager again.

ISACKSON found out recently that LAUREN previously took a picture with the soccer team. She was given a blue jersey to wear in the photo. When LAUREN questioned the jersey, WALTERS said they were short a player and to just put the jersey on. LAUREN was clueless about the bribery deal ISACKSON and BRUCE had made with USC, USCB, and UCLA.

WALTERS left UCLA suddenly approximately one year ago.

#### AUDREY:

ISACKSON was embarrassed that she went for any of this (meaning the testing scam); there was no excuse. ISACKSON hid everything from AUDREY. AUDREY was very honest, and would have just taken the test again if she did not do well. ISACKSON hired SINGER again for AUDREY this time. ISACKSON used SINGER for both the testing scam and the bribery deal. The testing scam was in or around June, prior to getting AUDREY into USC through athletics. AUDREY began prepping for the exam in or around March through June. SINGER said she should take it at his facility, of which he had three locations - Chicago, Texas, and LA. SINGER did not say where in Texas the facility was. ISACKSON decided to have AUDREY take the exam at SINGER's LA facility.

SINGER told ISACKSON the cost of the cheating would be \$75,000, and she told BRUCE. SINGER explained the cost was to fly people in to proctor, the hotels, etc. ISACKSON had no idea how SINGER allocated the money, just the justification for the \$75,000. ISACKSON knew that AUDREY's ACT scores were getting higher. She wanted AUDREY to do the test on her own and monitor the scores, with the option to change the score if needed.

The testing site in LA looked like a deserted high school. When ISACKSON and AUDREY arrived, the doors were locked. The janitor let them into the school. ISACKSON saw LUKE RICKFORD (RICKFORD), who pointed out which room to go to. RICKFORD was AUDREY's tutor who helped prepare her at

Continuation of FD-302 of (U) Davina Isackson On 04/02/2019 Page 8 of 11

her house. ISACKSON saw RICKFORD at the testing site the day of AUDREY's test and did not know why he was there. RICKFORD insulted AUDREY all the time. ISACKSON did not know anyone else at the testing site. ISACKSON left the testing site, and returned around 1600 pst. AUDREY texted her mother when she finished the test and was ready to be picked up. AUDREY said she was the only one in the room, besides IGOR. Being alone in the room helped AUDREY stay focused. IGOR was very strict about breaks, and did not allow AUDREY to bring her phone in. ISACKSON never thought IGOR was involved in the cheating, and was shocked. ISACKSON never met IGOR. ISACKSON did not see LIZ at the exam site. She thought she saw NATALIE, LIZ's daughter, but AUDREY told her mom that it was not NATALIE. SINGER told ISACKSON that LIZ was also doing the cheating scam with NATALIE. They were not happy with the 30 they got the second time and wanted a higher score. ISACKSON did not talk to LIZ about what she was doing with NATALIE's test as far as the cheating.

After the first exam, AUDREY thought she did fine. However, SINGER told ISACKSON that AUDREY's scores were shit; she only received a 24/25. SINGER wanted to change AUDREY's score to a 33. ISACKSON wanted to make the score more comfortable around 28. SINGER said ok, and agreed to make the score lower than the 33 to a 29-31. ISACKSON said that was ok because it was more realistic. ISACKSON was unaware how the score was actually altered, just that it was done.

AUDREY did not take the PSAT, only the ACT. ISACKSON knew the \$75,000 could give her the cheating option, but wanted to see how well AUDREY would do before she changed the score. ISACKSON had confidence in AUDREY, but the \$75,000 left the door open in case she needed it. SINGER never told ISACKSON how the test was altered. ISACKSON made it clear to SINGER that she did not want AUDREY to know about the cheating. ISACKSON knew AUDREY did not need the 31 to get in to school as an athlete. ISACKSON knew the manipulated score would be sent to USC.

BRUCE asked if he could write off the testing cost. SINGER said yes, but that instead of the \$75,000 they agreed on previously it would now have to be \$100,000 to the Foundation. BRUCE made all the payments and knew about the cheating. He did not want AUDREY to know because she would have been horrified.

Continuation of FD-302 of (U) Davina Isackson

On 04/02/2019 Page 9 of 11

ISACKSON knew that SINGER changed scores for other families at testing facilities also; it seemed like everything he did was "well greased." One of SINGER's quotes was always "I'll get it done for you."

In or around September, SINGER worked with ISACKSON on the bribery deal. AUDREY wanted to do her own thing because she saw what happened with LAUREN, and did not want anything to do with SINGER. AUDREY wanted to do her own college searches, and touring. SINGER brought up USC, which was not on her list. SINGER also helped set up her tour at TULANE with a student there, MATT LNU. During her tours, AUDREY saw approximately 6-8 schools. She really liked SMU and USC equally. SINGER pushed USC. AUDREY liked USC because it was closer to home. SINGER put the pressure on again as he did for LAUREN. It would be the same situation where she would go in as an athlete, and did not even have to go to orientation. ISACKSON was aware that this would be the same type of operation as what was done with LAUREN. She knew AUDREY would go in as an athlete, but did not know which sport. SINGER stated he only needed a picture, so ISACKSON sent a regular head shot.

AUDREY's college admission through athletics was much smoother than LAUREN's. ISACKSON just gave the picture, and SANFORD did the rest, i.e. the Common Application.

ISACKSON found out later, when it was done, that AUDREY was going into USC as a rower. ISACKSON knew that AUDREY gaining admission into USC through crew was facilitated by the payment. AUDREY did not row; she was an equestrian. The acceptance letter was very general. ISACKSON did not remember the letter dealing with NCAA. She thought this was precarious because LAUREN had received an NCAA type letter. ISACKSON was shown an email dated December 16, 2017. AUDREY was on the email. AUDREY did not question anything about the NCAA. They knew it needed to be hush hush because letters were not coming out until later. AUDREY knew she was going in through athletics, but not about a her fake profile. She thought it was just through a connection. ISACKSON never met DONNA HEINEL, but remembered hearing her name from SINGER.

ISACKSON had the same knowledge with AUDREY's deal as she did with LAUREN's; she thought the money was to fund a scholarship for an underprivileged student who would not otherwise be able to go. She believed

Continuation of FD-302 of (U) Davina Isackson , On 04/02/2019 , Page 10 of 11

the money was for an advanced spot. ISACKSON knew SINGER was crafting something for AUDREY, but did not see it.

ISACKSON knew that this method of gaining admission was not condoned by any of the schools or admissions offices because her children were going in as athletes. ISACKSON gave SINGER permission to use whatever to get it done. ISACKSON knew this was not legit because she had to lie to gain admission. She was aware that there was a difference between giving money to the schools versus through SINGER's Foundation.

## RYAN:

The testing scam was premature to start doing with RYAN, but he did have accommodations. ISACKSON reached out to SINGER to tell him she wanted to schedule his test elsewhere as well. She wanted to commit to a center, but not yet to alter the scores.

ISACKSON knew that when SINGER stated he could control the test room that it meant she would have the option of cheating for RYAN as well. RYAN was allowed to test in his own room, and if they needed to tweak his scores too, they could.

RYAN was tested for accommodations by ILANA JURKOWITZ (JURKOWITZ), who SINGER recommended. LAVINCE was not available to do RYAN's testing because of family issues she was taking care of. JURKOWITZ's results showed that RYAN qualified for 50% extra time. She automatically suggested that this should be done over multiple days because it was too long of a time intensity test to try in do in one day. JURKOWITZ never recommended that amount of time not over multiple days. ISACKSON paid JURKOWITZ approximately \$4,000-5,000 for the testing. RYAN was there for several hours being tested, and it seemed like she was doing her job properly. SINGER told ISACKSON he needed 100% extra time over multiple days, even though JURKOWITZ said 50%.

ISACKSON had a choice to get out of all the lies, but did not know how to; she felt stuck. A lot of kids at Woodside Priory could not handle the stress of getting in to college. They would smoke pot, drink, etc. that lead to a lot of suicides. The atmosphere at Woodside Priory was too much pressure and AP's.

318A-BS-2885343

Continuation of FD-302 of (U) Davina Isackson

 $_{,\,\mathrm{On}}$  04/02/2019  $_{,\,\mathrm{Page}}$  11 of 11

BRUCE told ISACKSON about SINGER's audit. BRUCE was concerned about the audit. In or around December, while ISACKSON was in Cabo, Mexico, she was on a call with SINGER. ISACKSON was on the call, but the money was BRUCE's department, not her's so she was not really in the conversation. She was not really paying attention because it was AUDREY's birthday, and she was also distracting ISACKSON to get off the phone so they could go celebrate.

[Agent Note: A short break was taken at approximately 11:45 est. At approximately 11:55 est Smith, O'Connell, and Wright stepped out for the remainder of the proffer.]